

EXHIBIT “i”

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CLERK OF THE COURT

1 **COMP**
2 **ZOE TERRY, ESQ.**
3 Nevada Bar No. 10900
4 **TERRY LAW GROUP, PC**
5 410 S. Rampart Blvd, Suite 390
6 Las Vegas, Nevada 89145
7 *Attorneys for Plaintiff*
8 (702) 726-6797
9 *zoe@terrylawgrouppc.com*

7 **DISTRICT COURT**
8 **CLARK COUNTY, NEVADA**

11 GLORIA REYES,
12 Plaintiff,

13 vs.

14 BODEGA LATINA CORPORATION, d/b/a
15 EL SUPER, DOES I – V, inclusive; ROE
16 CORPORATIONS I – V, inclusive,
17 Defendants.

Case No: A - 1 6 - 7 4 7 3 6 8 - C

Dept. No: X X I I I

17 **COMPLAINT**

18 NOW COMES Plaintiff, GLORIA REYES, by and through her counsel of record ZOE
19 TERRY, ESQ. of the law firm of TERRY LAW GROUP, PC and alleges as her Complaint against the
20 Defendants the following:

21 **GENERAL ALLEGATIONS**

22 **I**

23 At all times pertinent hereto, Plaintiff was an individual domiciled in the State of Nevada.

24 **II**

25 Plaintiff alleges upon information and belief, Defendant, BODEGA LATINA
26 CORPORATION, d/b/a EL SUPER, (hereinafter "EL SUPER") is a Delaware Corporation duly
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28

1 organized and existing under the laws of the State of Nevada and are engaged in doing business in Las
2 Vegas, Nevada.

3 III

4 That the true names and capacities, whether individual, corporate, associate, or otherwise of
5 Defendant DOES I through V, and/or ROE CORPORATIONS I through V, inclusive, are unknown to
6 Plaintiff who, therefore, sues said Defendants by such fictitious names. Plaintiff is informed and
7 believes and thereupon alleges that each of the Defendants designated herein as a DOE and/or ROE
8 CORPORATION is responsible in some manner for the events and happenings herein referred to, and
9 in some manner caused the injuries and damages proximately thereby to the Plaintiff. Plaintiff will
10 seek to amend this Complaint to insert the true identities of Defendant DOES I through V, and/or ROE
11 CORPORATIONS I through V, inclusive, when the same has been ascertained by Plaintiff, together
12 with the appropriate charging allegations, and to join such Defendants in this action.
13

14 IV

15 On or about December 2, 2014, Defendant, EL SUPER was the owner of premises at 1225 S.
16 Lamb Blvd., Las Vegas, Nevada, 89104, (hereinafter ("the Premises")). Defendant, EL SUPER and
17 DOES I through V, inclusive, and each of them, so owned, occupied, leased, subleased, constructed,
18 repaired, designed, controlled, possessed, maintained, managed and/or operated the above Premises so
19 as to cause Plaintiff to slip and fall on water near the entrance to the Premises and carelessly and
20 negligently failed to ensure the Premises was safe for use by Plaintiff and other guests and/or warn of a
21 potentially dangerous condition.
22

23 V

24 At the aforementioned place and date, Plaintiff, GLORIA REYES, was entering the Premises
25 when she slipped on the wet floor and fell to the ground. The water was not visible to Plaintiff and
26 rendered the floor dangerous for use for her and other guests; and Defendants had actual and/or
27
28

1 constructive notice of the wet floor as it had been raining but had no warning cones or signs or other
2 warning of such hazard.

3 **VI**

4 Defendants knew or should have known that a wet floor by the entrance to a busy grocery store
5 was dangerous and in the exercise of ordinary care would have had reasonable opportunity to remedy
6 the situation prior to the happening of the fall herein alleged. In spite of Defendants' actual and/or
7 constructive notice of the wet floor, Defendants failed to take adequate precautions to prevent injury to
8 Plaintiff and/or other guests.

10 **VII**

11 Defendants were careless and negligent in the following respects:

- 12 1. Failing to inspect the area prior to the incident in question;
- 13 2. Failing to adequately clean and/or dry the floor so as to prevent injury to guests even
14 though it was raining;
- 15 3. Failing to place warning signs and/or cones so as not to cause injury to guests;
- 16 4. Failing to cordon off the area so as to prevent injury to guests.

18 **VIII**

19 As a direct and proximate result of the carelessness and negligence of Defendants, Plaintiff
20 sustained personal injuries. As a result of these injuries, medical and other special expenses have been
21 incurred in a sum in excess of TEN THOUSAND DOLLARS (\$10,000).

22 **IX**

23 As a further direct and proximate result of said injuries, Plaintiff sustained great pain and
24 suffering, expense and inconvenience in a sum to be proven at trial.

25 ///

26 ///

27 ///

X

The failure to adequately clean and/or dry the floor or in the alternative place warning signs/cones or cordon off the area and adequately warn of the potential hazard was within the exclusive possession and control of Defendants, the injury which occurred to Plaintiff, would not have occurred in the absence of negligence, and the doctrine of res ipsa loquitor should be applied herein for Plaintiff's benefit.

XI


As a further direct and proximate result of the aforementioned negligence, Plaintiff has been compelled to retain the services of an attorney to prosecute this action, and Plaintiff is, therefore, entitled to reasonable attorney fees and costs of suit incurred herein.

WHEREFORE, Plaintiff, expressly reserves her right to amend this Complaint at the time of trial of the actions herein to include all items of damages not yet ascertained, demands Judgment against Defendant and each of them as follows:

1. For general damages in a sum in excess of \$10,000;
2. For damages for costs of medical care and treatment and other Special Damages;
3. For lost wages to be determined;
4. For costs herein incurred and attorney fees;
5. For other such and further relief as the Court deems just and proper.

DATED this 30th day of November, 2016.

TERRY LAW GROUP, PC



ZOE TERRY, ESQ.
Nevada Bar No. 10900
410 South Rampart Blvd, Suite 390
Las Vegas, Nevada 89145
Attorney for Plaintiff

DISTRICT COURT CIVIL COVER SHEET

County, Nevada

A - 1 6 - 7 4 7 3 6 8 - C

Case No. _____

X X I I I

(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): Gloria Reyes	Defendant(s) (name/address/phone): Bodega Latina Corporation, d/b/a El Super
Attorney (name/address/phone): Zoe Terry, Esq. (702) 726-6797 TERRY LAW GROUP, PC 410 S. Rampart Blvd., Suite 390 Las Vegas, NV 89145	Attorney (name/address/phone):

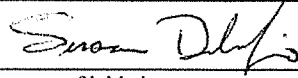
II. Nature of Controversy (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input checked="" type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court civil coversheet.

November 30, 2016

Date


 Signature of initiating party or representative

See other side for family-related case filings.